

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et.al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: D.I. Nos. 760, 876, 930, and 1618

**WITNESS AND EXHIBIT LIST OF BURLINGTON
COAT FACTORY WAREHOUSE CORPORATION RELATING TO
MATTERS SCHEDULED FOR HEARING ON AUGUST 26, 2025 AT 1:00 P.M. (ET)**

Burlington Coat Factory Warehouse Corporation (“Burlington”), by and through its undersigned counsel, hereby submits this Witness and Exhibit List for the hearing to be held on August 26, 2025, at 1:00 p.m. (ET) (the “Hearing”) with respect to the following matters and any related matters going forward at the Hearing:

1. *Rayzor Ranch Marketplace Associates, LLC’s Objection to Assumption and Assignment of Unexpired Lease for Premises Located at Rayzor Ranch Marketplace in Denton, Texas* [Docket No. 876];
2. *Amended First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 930]; and
3. *Burlington Coat Factory Warehouse Corporation’s Reply to Rayzor Ranch Marketplace Associates, LLC’s Objection to Assumption and Assignment of Unexpired Lease for Premises Located at Rayzor Ranch Marketplace in Denton, Texas* [Docket No.1618].

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

WITNESS LIST

Burlington reserves the right to call any witness listed or called by any other party; and rebuttal witnesses as necessary. Burlington reserves the right to cross-examine any witness called by any other party.

EXHIBITS

Burlington designates the following exhibits that may be used at the Hearing:

Exhibit	Description	Docket No./ Bates No.
1.	In re Joann Inc., et al., Case No. 25-10068 (CTG) (Bankr. D. Del. 2025) 7/31/2025 Hr'g Tr., Docket No. 1525	1618-1
2.	In re Bed Bath & Beyond, Inc., Case No. 23-13359 (VFP) (Bankr. D. N.J. 2023), 8/30/2023 Hr'g Tr., Docket No. 2115	1618-2
3.	In re Big Lots, Inc., et al., Case No. 24-11967 (JKS) (Bankr. D. Del. 2024), 1/21/2025, Docket No. 1838	1618-3
4.	Burlington Stores, Inc. United States Securities and Exchange Commission Form 10-K For the fiscal year ending February 1, 2025	1618-4
5.	Jo-Ann Stores, Inc. United States Securities and Exchange Commission Form 10-K For the fiscal year ending January 29, 2011	1618-5
6.	Joann May 1, 2012 Waiver Letter regarding Ross	1618-6
7.	Lease Agreement by and between RR Marketplace, LP and Jo-Ann Stores, Inc., dated November 17, 2010	

RESERVATION OF RIGHTS

Burlington reserves (a) the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing and add witnesses and/or exhibits, as applicable, and (b) the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing Witness and Exhibit List as appropriate. Burlington also reserves the right to rely upon and use as evidence (a) exhibits included on the exhibit list of any other parties in interest, and (b) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: August 22, 2025

/s/ Marcy J. McLaughlin Smith

WOMBLE BOND DICKINSON (US) LLP

Matthew P. Ward (DE Bar No. 4471)

Marcy J. McLaughlin Smith (DE Bar No. 6184)

1313 North Market Street, Suite 1200

Wilmington, DE 19801

Telephone: (302) 252-4320

Facsimile: (302) 252-4330

Email: matthew.ward@wbd-us.com

marcy.smith@wbd-us.com

-and-

JACKSON WALKER LLP

Kristhy M. Peguero (DE Bar No. 4903; TX Bar No. 24102776)

Victoria Argeroplos (TX Bar No. 24105799)

1401 McKinney Street, Suite 1900

Houston, TX 77010

Telephone: (713) 752-4200

Email: kpeguero@jw.com

vargeroplos@jw.com

William Farmer (TX Bar No. 24127156)

2323 Ross Avenue, Suite 600

Dallas, TX 75201

Telephone: (214) 953-5859

Email: wfarmer@jw.com

Co-Counsel for Burlington Coat Factory Warehouse Corporation